

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4 ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960

APR 2 8 2009

SITE: Ore Knob
BREAK: 11.9
OTHER: V.14

40EA

SUPPLEMENTAL INFORMATION REQUEST LETTER URGENT LEGAL MATTER - PROMPT REPLY NECESSARY CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Randall G. Vickery, Esq. Freeborn & Peters LLP 311 South Wacker Drive Suite 3000 Chicago, Illinois 60606-6677

SUBJECT:

Supplemental Request for Information Pursuant to Section 104(e) of CERCLA for the Ore Knob Mine Superfund Site, Laurel Springs,

Ashe County, North Carolina

Dear Mr. Vickery:

Thank you for the response to the United States Environmental Protection Agency's ("EPA's") Information Request you sent on October 7, 2008 on behalf of your client, the Copper Range Company ("Copper Range"). The purpose of this letter is to request that your client respond to the enclosed Information Requests to supplement the information your client previously provided.

As you are aware, EPA is currently investigating the release or threatened release of hazardous substances, pollutants or contaminants, or hazardous wastes on or about the Ore Knob Mine Superfund Site ("Site") in Laurel Springs, Ashe County, North Carolina. This investigation requires inquiry into the identification, nature, and quantity of materials generated, treated, stored, or disposed of at the Site, or transported to the Site. The inquiry will also address the nature or extent of a release or threatened release of hazardous substances, pollutants, or contaminants at or from the Site. EPA also is seeking information relating to the ability of a person to pay for or to perform a cleanup of the Site.

Pursuant to the authority of Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. § 9604, as amended, your client

or an authorized representative of its company is hereby requested to respond to the supplemental Information Request enclosed with this letter.

Compliance with the Information Request is mandatory. Failure to respond fully and truthfully to the Information Request within thirty (30) days of receipt of this letter, or to adequately justify failure to respond, can result in enforcement action by EPA pursuant to Section 104(e) of CERCLA, as amended. This statute permits EPA to seek the imposition of penalties of up to thirty-seven thousand, five hundred dollars (\$37,500) for each day of continued noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations to the Information Request may subject your client or its company to criminal penalties under 18 U.S.C. § 1001 or Section 3008(d) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(d).

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Your client's responses to this Information Request should be mailed to me at:

Suzanne K. Armor, Associate Regional Counsel
Office of Environmental Accountability
U.S. EPA Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Due to the seriousness of the problem at the Site and the legal ramifications of your client's failure to respond properly, EPA strongly encourages your client to give this matter immediate attention and to respond to these Information Requests within the time specified above. If you or your client has any questions relating to these Information Requests, you may consult with EPA prior to the time specified above. Please direct any legal questions to Suzanne Armor, Associate Regional Counsel, at (404) 562-9701, and general questions to Karen Coleman, Enforcement Project Manager, at (404) 562-8853.

Thank you for your cooperation in this matter.

Sincerely,

Suzanne K. Armor

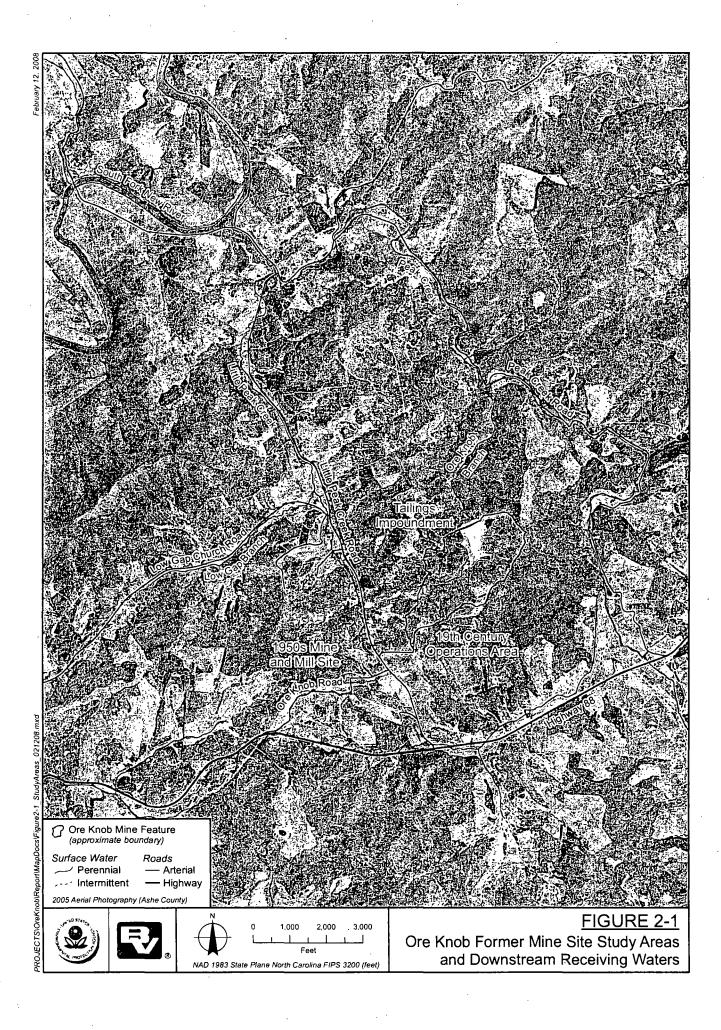
Associate Regional Counsel

Office of Environmental Accountability

Enclosures

- 1. Enclosure A: Site Map
- 2. Information Request Instructions and Definitions
- 3. Information Request Questions

ENCLOSURE A: SITE MAP



INFORMATION REQUEST

Instructions

1. Answer Every Question Completely.

A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this information request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.

2. Number Each Answer.

Precede each answer with the corresponding number of the question and the subpart to which it corresponds.

3. <u>Provide the Best Information Available.</u>

Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to you will be considered non-compliant with this Information Request.

4. Identify the Sources of Each Answer.

For each and every question contained herein, identify (see Definitions) all persons consulted in the preparation of the answer. Also identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide true and accurate copies of all such documents.

5. Abide By Your Continuing Obligation to Provide/Correct Information.

If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) Section 104(e), 42 U.S.C. Section 9604(e), that you supplement your response to EPA.

6. Understand How to Request Confidential Treatment of Your Information.

The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. Sections 9604(e)(7)(E) and (F), and Section 3007(b) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6927(b), and 40 C.F.R. Section 2.203(b).

If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

- A. The portions of the information alleged to be entitled to confidential treatment;
- B. The period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
- C. Measures taken by you to guard against the undesired disclosure of the information to others;
- D. The extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
- E. Pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- F. Whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

7. Be Aware of Potential Disclosure to EPA Contractors.

Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. Section 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

8. Mark Any Personal Privacy Information.

Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."

9. Answer Despite Objections to Questions.

If you have objections to some or all the questions within the Information Request letter, you are still required to respond to each of the questions.

Definitions

The following definitions shall apply to the following words as they appear in this Supplemental Information Request.

- A. The term "you" or "Respondent" shall mean the Copper Range Company, its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.
- B. The term "person" shall include any individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.
- C. The terms the "Site" or the "facility" shall mean the Ore Knob Mine Superfund Site, encompassing approximately 165 acres, located in Ashe County, North Carolina, approximately 12 miles south of the Virginia state line, 45 miles southeast of Bristol, Tennessee, and 8 miles east of the town of Jefferson, North Carolina, as depicted generally on the map attached as Appendix A to Enclosure A. The Site contains areas affected by mining, including three principal areas that were directly affected by mining along with other areas, primarily downstream, where hazardous substances have come to be located. The three principal areas include the 19th Century Operations Area, 1950s Mine and Mill Area, and a Main Tailings Impoundment. The 1950's Mine and Mill Area is located northwest of the intersection of Ore Knob Road and Little Peak Creek Road, just north of Highway 88. The 19th Century Operations Area and Tailings Impoundment are located across Little Peak Road, at the end of Ore Knob Mine Road.
- D. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
- E. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
- F. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.
- G. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site, including but not limited to, all

hazardous substances, pollutants and contaminants, hazardous wastes and solid wastes, as defined above and all mine tailings, or other waste material relating to mining operations as well as all tree stumps and other land clearing debris.

- H. The term "hazardous material" shall mean all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above.
- I. The term "non hazardous material" shall mean all material as defined above, excluding hazardous substances, pollutants and contaminants, and hazardous waste.
- J. The term "contamination" shall include, but not be limited to, hazardous substances, plus any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction), or physical deformations; except that the term "pollutant or contaminant" shall not include petroleum.

K. The term "identify" means:

- i. With respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address) with title, position, and business.
- ii. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), to provide: (a) its full name; (b) address; and (c) affiliation with the individual and/or company to whom/which this request is addressed.
- iii. With respect to a document, to provide: (a) its customary business description; (b) its date; (c) its number, if any (invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; and (e) the substance or the subject matter.
- L. The term "company" shall mean any business entity, however formally or informally organized, which has ever existed, regardless of its current status.

- M. The term "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies. These may include by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreement and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications. photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (1) every copy of each document which is not an exact duplicate of a document which is produces, (2) every copy which has any writing, figure or notation, annotation or the like on it, (3) drafts, (4) attachments to or enclosures with any document, and (5) every document referred to in any other document.
- N. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
- O. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
- P. The term "arrangement" means every separate contract or other agreement between two or more persons.
- Q. The terms "transaction" or "transact" mean any sale, transfer, giving, delivery, change in ownership, or change in possession.
- R. The term "property interest" means any interest in property including but not limited to, any ownership interest, including an easement, any interest in the rental of property, any interest in a corporation that owns or rents or owned or rented property, and any interest as either the trustee or beneficiary of a trust that owns or rents, or owned or rented property.

- S. The term "asset" shall include the following: real estate, buildings or other improvements of real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations and unincorporated companies, securities, patents, stocks, bonds, and other tangible as well as intangible property.
- T. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
- U. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300, or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

Ore Knob Mine Superfund Site Laurel Springs, Ashe County, North Carolina Information Request Questions

QUESTIONS

- 1. Identify the person(s) answering these Questions.
- 2. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.
- 3. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.
- 4. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:
 - a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.
- 5. Provide all copies of the Respondent's authority to do business in Delaware and Michigan. Include all authorizations, withdrawals, suspensions, and reinstatements.
- 6. Provide all existing prospectus, brochures, or other printed material that has been or is currently being used to offer and/or promote the acquisition of shares or other interest(s) in the business.
- 7. Provide a copy of all minutes of the meetings of the Board of Directors, Executive Committee, Finance Committee, Management Committee, and all other committees which the Company might have, from the date of its incorporation in Michigan to the present.
- 8. Provide a list of customers (e.g., smelters, mills, governments and industries) the Respondent had dealings with during the years the Respondent had property interests,

- mine leases, assignments, agreements, or arrangements with landowners at the Site, whether or not mining took place during those years.
- 9. Provide copies of minutes of meetings of Corporate Directors, for all the years during which the Respondent (or Respondent's predecessor) held assets at or property interests in the Site; whether or not mining took place during those years.

Appalachian Sulfides, Inc. (a.k.a. Appalachian Sulphides, Inc.)

- 10. Describe the nature and extent of any ownership interest that you may have had in Appalachian Sulfides, Inc., a.k.a. Appalachian Sulphides, Inc. ("Appalachian Sulfides"), a Delaware corporation, and when and how such ownership interest was acquired.
- 11. Provide a history (e.g., payment dates, amounts received, etc.) of dividends received by you, or any of your subsidiaries, from Appalachian Sulfides resulting from your ownership of capital stock in Appalachian Sulfides.
- 12. Have you or any of your subsidiaries ever provided any assistance, guidance, advice, or input of any nature to Appalachian Sulfides in the preparation or formulation of Appalachian Sulfides' business strategy, business goals, budgets, forecasts, etc.? If so, explain in detail.
- 13. Have you or any of your subsidiaries ever made any loan(s) to Appalachian Sulfides? If so, provide complete information pertaining to such loan(s), including copies of all loan documentation (i.e., loan agreements, promissory notes, guarantees, security agreements, financing statements, amortization/payment tables), and complete information pertaining to any assignment, extension, composition, restructuring, etc. of such loan(s). For the purposes of this question, "loan" shall include the establishment of a line of credit by Copper Range or any of its subsidiaries for the use and/or benefit of Appalachian Sulfides, whether or not such line of credit has ever been drawn on.
- 14. Have you or any of your subsidiaries ever provided any clerical, administrative, professional, or other services or assistance to Appalachian Sulfides? If so, provide a complete description of the nature of services or assistance provided, along with the time period(s) during which such services or assistance was provided.
- Have you or any of your subsidiaries ever leased or rented any furnishings, fixtures, equipment, personal, or real property to Appalachian Sulfides? If so, provide a complete

- description of the type of property leased or rented, and the terms and duration of such arrangement.
- 16. Have you or any of your subsidiaries ever provided any training of any nature to any director, officer, or employee of Appalachian Sulfides? If so, provide a complete description of such training, including the nature of the training, who it was offered to, who participated in it (both as instructors and instructees), and when and where it was conducted.
- 17. Have you or any of your subsidiaries ever acted directly or indirectly to guarantee any loan made to Appalachian Sulfides? If so, provide complete information regarding such arrangement, including copies of all documents pertaining to such arrangement.
- 18. Did any of the employees, officers, and/or directors of Appalachian Sulfides participate in any manner in any savings programs, ESOPs, pension plans, deferred compensation, or other arrangements offered or sponsored by you or any of your subsidiaries? If so, explain in detail.
- 19. Was Appalachian Sulfides required to, or did Appalachian Sulfides receive, your approval or concurrence or the concurrence of any of your subsidiaries when making expenditures? If so, explain in detail.
- 20. Have any of Appalachian Sulfides employees ever been employed by you or any of your subsidiaries? If so, provide each such employee's name, job title, and dates of employment.
- 21. Have you or any of your subsidiaries and Appalachian Sulfides ever had common directors? If so, provide the names and dates of service of such directors.
- 22. Have Copper Range and Appalachian Sulfides ever filed consolidated tax returns? If so, provide complete copies of such returns.
- 23. Is Copper Range the successor to all liabilities, including those under the Comprehensive Environmental Response, Compensation and Liability Act, as amended, by the Superfund Amendments and Reauthorization Act of Appalachian Sulfides?
- 24. If your answer to Question No. 23 above is "no," respond fully to the following questions:

Describe in detail Copper Range's past and current relationship with Appalachian Sulfides and the facility located at Ore Knob Mine in Ashe County, North Carolina. Respond to each of the following questions:

- a. State the date on which Copper Range acquired ownership or an interest in Appalachian Sulfides and the facility. State the prior owners, if any, of Appalachian Sulfides and the facility. Submit a copy of all documents relating to Copper Range's purchase of Appalachian Sulfides and the facility. Provide documentation on the amount Copper Range paid for its interest in Appalachian Sulfides.
- b. Did the company sell or otherwise divest itself of any stock, assets, or other interest in Appalachian Sulfides or any other company which operated at the Site?
- c. If the answer to (a) is "yes," fully describe the nature of the sale and/or transaction. State if the transaction consisted of a merger, consolidation, sale, or transfer of assets, and submit all documents relating to such transaction, including all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.
- d. Did Copper Range retain the liabilities of Appalachian Sulfides for events prior to the sale?
- 25. Identify all meetings and communications which the officers, directors, or employees of Appalachian Sulfides participated in or attended regarding the operations of the facility.
- 26. Identify what, if any, reports, statements, or other documents Copper Range's officers or directors wrote or received regarding the operations of the facility by Appalachian Sulfides and describe what, if any, information the officers and directors received concerning the operations of the facility by Appalachian Sulfides.
- 27. Identify any employees, officers, or directors of Copper Range who participated in discussions or other communications regarding any decision to utilize or continue to utilize the Site for disposal of waste materials from the facility, including placement of mining tailings at the tailings impoundment.
- 28. State whether any officers or directors of Copper Range approved, authorized, discussed, or had knowledge or awareness of any arrangement to dispose of wastes from the facility

at the Site, including placement of mining tailings at the tailings impoundment. Describe the nature and extent of such approval, authorization, discussion, knowledge, or awareness.

- 29. Were any reports discussing waste disposal practices at the Facility, including placement of mine tailings in the tailings impoundment, ever received by officers or directors of Copper Range? If your answer to this question is in the affirmative, indicate: (1) when such reports were received; (2) who the originator of such reports was; (3) who such reports were directed to; and (4) the content of such reports. If such reports are in your possession or control, submit copies of such reports to EPA.
- 30. Describe the circumstances surrounding the dissolution of Appalachian Sulfides, including in your answer the following:
 - a. the exact date of dissolution;
 - b. the names and addresses of any and all shareholders at the time of dissolution;
 - c. the value of all assets distributed to each shareholder as a result of the dissolution;
 - d. the final disposition of all assets, liabilities, and shares of Appalachian Sulfides;
 - e. the identity of all parties to any transactions relating to or arising out of the dissolution; and
 - f. the identity of all documents relating to the dissolution.
- 31. State whether any business records of Appalachian Sulfides are still in existence. If the answer is yes, state the location of these records and produce:
 - · a. all documents relating to the disposal of any wastes; and
 - b. all documents relating to the disposal of any hazardous substances, hazardous waste, or solid waste at the Site.
- 32. Identify any successor corporations or other entities of Appalachian Sulfides.

- 33. If Appalachian Sulfides was a subsidiary of another corporation, identify such other corporation and state the dates during which the parent/subsidiary relationship existed and the names and addresses of that corporation's president, chairman of the board, and other officers.
- 34. Describe any asset purchase agreements, whereby some or all of the assets of Appalachian Sulfides were ever sold to any other entity, including the date(s), the companies involved, and the terms of such asset purchase agreement(s).

Relevant Affiliations

- 35. If you, your company, or any of your company's officers (current or former) have conducted business with any of the following, please describe the nature of that business, the individuals or companies involved, and the time period during which the business was transacted. Include any sales of assets, land, mineral rights, or equipment, or any negotiations for sales of assets, land, mineral rights, or equipment:
 - a. Patiño Mining Corporation, a Canadian corporation;
 - b. Nipissing Mines Company, Ltd., a Canadian corporation;
 - c. Minaco Equipment, Ltd., a Canadian corporation; or
 - d. Ventures, Ltd., a Canadian corporation.

Copper Range Corporate History

- 36. If Copper Range has had any changes in company name, ownership, or structure, or has obtained an interest in or dissolved itself of an interest in any other corporation, subsidiary, division, or other entity, identify such transaction. State if the transaction consisted of a merger, consolidation, sale, or transfer of assets. Submit all documents relating to such transactions included all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.
 - a. For each change in ownership, describe the type of change (i.e., asset purchase, corporate merger, or name change) as well as the date of the change in ownership.

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- b. For all asset purchases identified, please provide a copy of the asset purchase agreement.
- c. For all corporate mergers identified, please provide a copy of the merger document.
- d. Provide a copy of the agreement of sale as well as all attachments and amendments to this agreement of sale including related agreements such as exclusive service contracts, not-to-compete agreements, or consulting agreements that document each asset sold as well as the consideration paid for each and every asset.
- e. Identify all consideration paid for Copper Range's assets. In identifying the consideration, provide the amount paid in cash, the amount paid in promissory notes or other form of debenture payable to the entity and/or officers, directors and/or shareholders of the entity selling the assets, the value associated with the assumption of liabilities (if assumption of liabilities are involved, you are also to identify the types of liabilities assumed), the value associated with the performance of services, the value associated with shares of stock exchanged as part of the sale, and the type and value associated with any other form of consideration not identified above.
- f. For all promissory notes or other form of debenture identified in Question 36e above, has there been a renegotiation of the terms and conditions relating to this debt? If there has, describe the changes made and provide documentation that substantiates these changes. Furthermore, if any payment was late, reduced, or is in arrears, identify the amount of the payment, the original due date of the payment, and the number of days in arrears.
- 37. List the complete legal names of the corporations created, renamed, merged, or dissolved through such transactions and identify which such action applies to which corporation.

END

902 3733	U.S. Postal Service M. GERTIFIED MAIL RECEIPT (Domestic Mail Only, No Insurance Coverage Provided) For delivery information visit our website at www.usps.coms		
4 LOOD 0755 2007	Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postal Mr. Randall G. Vici Sent To Freedom & Peters I Street, Apr. N or PO Box Nc Chicago, IL 60606-City, State, Z. PS Form 3800: June 2002	LLP ———————————————————————————————————	